

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.	Filed Under Seal
v.	:	DATE FILED:	
RAMON LEIJA-VEST	:	VIOLATIONS:	
	:	18 U.S.C. § 1344 (bank fraud – 4 counts)	
	:	18 U.S.C. § 2 (aiding and abetting)	
		Notice of forfeiture	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Pennsylvania State Employees Credit Union (“PSECU”) was a financial institution chartered by the National Credit Union Administration, charter number 64131, whose deposits were insured by the National Credit Union Share Insurance Fund.

2. From in or about June 2016, to in or about October 2017, in the Eastern District of Pennsylvania and elsewhere, defendant

RAMON LEIJA-VEST

alone and with co-schemers known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud PSECU and to obtain monies owned by and under the care, custody, and control of PSECU by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Co-schemer Mitchell Neil Thompson personally opened an account at

PSECU and recruited other co-schemers, including defendant RAMON LEIJA-VEST and co-schemers Zhykeir Malik Burdine and Charlese Lynn Carroll, each charged separately and others (hereinafter referred to as the “Account Holders”), to open accounts at PSECU in order to use the accounts to defraud PSECU, by promising the co-schemers a share of the fraud proceeds successfully obtained from PSECU.

4. Defendant RAMON LEIJA-VEST and co-schemer Mitchell Neil Thompson together recruited co-schemer Christian Gonzalez, charged separately, to open an account at PSECU in order to use the account to defraud PSECU, by promising Gonzalez a share of the fraud proceeds successfully obtained from PSECU.

5. Co-schemer Mitchell Neil Thompson instructed the Account Holders to provide him with their Automated Teller Machine (“ATM”) debit cards and personal identification numbers (“PINs”), as well as their checkbooks for their PSECU accounts.

6. Co-schemer Mitchell Neil Thompson used his own ATM debit card and PIN, as well as the ATM debit cards and PINs of his co-schemers, to purport to make deposits into his own accounts and the accounts of the Account Holders at ATMs.

7. Instead of making actual deposits into the accounts, co-schemer Mitchell Neil Thompson deposited empty envelopes at the ATMs while utilizing the ATM keypads to falsely indicate that he had deposited cash in various denominations into the accounts.

8. Co-schemer Mitchell Neil Thompson used his own ATM debit card and PIN, as well as the ATM debit cards and PINs of his co-schemers, to withdraw cash from the PSECU accounts via cash withdrawals at ATMs and via point of sale (“POS”) transactions and cash withdrawals at various merchants, before PSECU discovered that the purported deposits were in fact empty envelopes that contained no cash or checks.

PSECU ACCOUNT OF RAMON LEIJA-VEST

(Intended Loss of \$1,100; Actual Loss of \$992.28)

9. On or about October 14, 2017, at the direction of co-schemer Mitchell Neil Thompson, defendant RAMON LEIJA-VEST opened a PSECU checking and savings account via an online application.

10. On or before October 22, 2017, defendant RAMON LEIJA-VEST gave co-schemer Mitchell Neil Thompson the ATM debit card and PIN associated with defendant LEIJA-VEST's PSECU account, and the checkbook for defendant LEIJA-VEST's PSECU account, in return for a promise of a portion of the proceeds successfully obtained by Thompson through a fraud on PSECU using defendant LEIJA-VEST's account.

11. On or about October 22, 2017, at a Riverfront Federal Credit Union ("RFCU") ATM located in Reading, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with defendant RAMON LEIJA-VEST's PSECU account to deposit empty envelopes, which Thompson falsely indicated contained approximately \$1,100 by inputting that amount into the ATM keypad.

12. On or about October 22, 2017, at an RFCU ATM located in Reading, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with defendant RAMON LEIJA-VEST's PSECU account to withdraw approximately \$300 cash from that account.

13. On or about October 22, 2017, at a Walmart store located in Temple, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with defendant RAMON LEIJA-VEST's PSECU account to obtain a total of approximately \$202.68 in cash and goods via POS transactions and cash withdrawals.

14. On or about October 23, 2017, at an ATM located in Reading, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with defendant RAMON LEIJA-VEST's PSECU account to withdraw approximately \$303.50 cash from that account.

15. On or about October 23, 2017, at a Walmart store located in Temple, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with defendant RAMON LEIJA-VEST's PSECU account to obtain a total of approximately \$186.10 in cash and goods via POS transactions and cash withdrawals.

PSECU ACCOUNT OF CHRISTIAN GONZALEZ

(Intended Loss of \$1,050; Actual Loss of \$991.91)

16. On or about October 14, 2017, at the direction of defendant RAMON-LEIJA-VEST and co-schemer Mitchell Neil Thompson, co-schemer Christian Gonzalez opened a PSECU checking and savings account via an online application.

17. On or before October 22, 2017, co-schemer Christian Gonzalez gave co-schemer Mitchell Neil Thompson the ATM debit card and PIN associated with Gonzalez's PSECU account, and the checkbook for Gonzalez's PSECU account, in return for a promise of a portion of the proceeds successfully obtained by Thompson through a fraud on PSECU using Gonzalez's account.

18. On or about October 22, 2017, at an RFCU ATM located in Reading, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with co-schemer Christian Gonzalez's PSECU account to deposit empty envelopes, which Thompson falsely indicated contained approximately \$1,050 by inputting that amount into the ATM keypad.

19. On or about October 22, 2017, at an RFCU ATM located in Reading, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with co-schemer Christian Gonzalez's PSECU account to withdraw approximately \$300 cash from that account.

20. On or about October 22, 2017, at a Walmart store located in Temple, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with co-schemer Christian Gonzalez's PSECU account to obtain a total of approximately \$295.72 in cash and goods via POS transactions and cash withdrawals.

21. On or about October 22, 2017, at a Turkey Hill store located in Reading, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with co-schemer Christian Gonzalez's PSECU account to obtain a total of approximately \$11.35 in cash and goods via POS transactions and cash withdrawals.

22. On or about October 23, 2017, at an ATM located in Reading, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with co-schemer Christian Gonzalez's PSECU account to withdraw approximately \$303.50 cash from that account.

23. On or about October 23, 2017, at a Walmart store located in Temple, Pennsylvania, co-schemer Mitchell Neil Thompson utilized the ATM debit card and PIN associated with co-schemer Christian Gonzalez's PSECU account to obtain a total of approximately \$81.34 in cash and goods via POS transactions and cash withdrawals.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3-5, 10, and 17 of Count One are incorporated here.
2. At all times material to this information, BB&T Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 9846.
3. From in or about October 2017, to in or about March 2018, in the Eastern District of Pennsylvania and elsewhere, defendant

RAMON LEIJA-VEST

alone and with co-schemers known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud BB&T Bank and to obtain monies owned by and under the care, custody, and control of BB&T Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

4. Co-schemer Mitchell Neil Thompson recruited other co-schemers, including defendant RAMON LEIJA-VEST and co-schemers Charlese Lynn Carroll and Christian Gonzalez, to open accounts at BB&T Bank, in order to use the accounts to defraud BB&T Bank by depositing fraudulent checks into the accounts, by promising them a share of the fraud proceeds successfully obtained from BB&T Bank.
5. Co-schemer Charlese Lynn Carroll recruited other co-schemers, including Israel Martinez, charged separately, to open accounts at BB&T Bank, in order to use the accounts to defraud BB&T Bank by depositing fraudulent checks into the accounts, by promising the co-schemers a share of the fraud proceeds successfully obtained from BB&T Bank.

6. Defendant RAMON LEIJA-VEST, co-schemer Christian Gonzalez, and other co-schemers gave co-schemer Mitchell Neil Thompson the checkbooks from their accounts at PSECU, which the co-schemers had previously opened at Thompson's direction.

7. Co-schemer Mitchell Neil Thompson provided other co-schemers with funds to open the BB&T Bank accounts and fraudulent checks to deposit into their accounts.

BB&T BANK ACCOUNT OF CHRISTIAN GONZALEZ

(Intended Loss of \$450; Actual Loss of \$80)

8. On or before November 2, 2017, at the request of co-schemer Mitchell Neil Thompson, co-schemer Christian Gonzalez agreed to open a BB&T Bank account in order for the account to be used to cash fraudulent checks and to obtain the funds before BB&T Bank discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from BB&T Bank.

9. On or about November 2, 2017, at a BB&T Bank branch located in Muhlenberg Township, Berks County, Pennsylvania, co-schemer Christian Gonzalez opened a BB&T Bank account.

10. On or about November 6, 2017, at a BB&T Bank branch located in Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Christian Gonzalez deposited a fraudulent check into Gonzalez's BB&T account -- check #164, drawn on the PSECU account of defendant RAMON LEIJA-VEST, and made payable to Gonzalez in the amount of approximately \$450.

11. Between on or about November 6, 2017, and on or about November 7, 2017, one or more co-schemers withdrew approximately \$80 from co-schemer Christian Gonzalez's BB&T account.

BB&T BANK ACCOUNT OF RAMON LEIJA-VEST

(No Loss)

12. On or before February 9, 2018, at the request of co-schemer Mitchell Neill Thompson, defendant RAMON LEIJA-VEST agreed to open a BB&T Bank account in order for the account to be used to cash fraudulent checks and to obtain the funds before BB&T Bank discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from BB&T Bank.

13. On or about February 9, 2018, at a BB&T Bank branch located in Reading, Pennsylvania, while co-schemers Mitchell Neil Thompson, Charlese Lynn Carroll, and Israel Martinez waited in the car outside, defendant RAMON LEIJA-VEST went inside the branch and attempted without success to open a new BB&T Bank account.

BB&T BANK ACCOUNT OF ISRAEL MARTINEZ

(Intended Loss of \$470; Actual Loss of \$100)

14. On or before February 9, 2018, at the request of co-schemer Charlese Lynn Carroll, co-schemer Israel Martinez agreed to open a BB&T Bank account in order for the account to be used to cash fraudulent checks and to obtain the funds before BB&T Bank discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from BB&T Bank.

15. On or about February 9, 2018, at a BB&T Bank branch located in Reading, Pennsylvania, while defendant RAMON LEIJA-VEST and co-schemers Mitchell Neil Thompson and Charlese Lynn Carroll waited in the car outside, co-schemer Israel Martinez opened a BB&T Bank account.

16. On or about March 1, 2018, at a BB&T Bank branch located in Berks

County, Pennsylvania, a co-schemer deposited a fraudulent check into co-schemer Israel Martinez's BB&T account -- check #105, drawn on the PSECU account of co-schemer Christian Gonzalez, and made payable to co-schemer Israel Martinez in the amount of approximately \$470.

17. On or about March 1, 2018, at a BB&T Bank branch located in Exeter Township, Berks County, Pennsylvania, a co-schemer withdrew approximately \$100 from co-schemer Israel Martinez's BB&T account.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3-5, 10, and 17 of Count One are incorporated here.
2. At all times material to this information, First National Bank of Pennsylvania (“FNB”) was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 7876.
3. In or about November 2017, in the Eastern District of Pennsylvania and elsewhere, defendant

RAMON LEIJA-VEST

alone and with co-schemers known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud FNB and to obtain monies owned by and under the care, custody, and control of FNB by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

4. Co-schemer Mitchell Neil Thompson recruited other co-schemers, including Charlese Lynn Carroll, to open accounts at FNB, in order to use the accounts to defraud FNB by depositing fraudulent checks into the accounts, by promising the co-schemers a share of the fraud proceeds successfully obtained from FNB.
5. Co-schemer Mitchell Neil Thompson instructed the co-schemers to provide him with their Automated Teller Machine (“ATM”) debit card and personal identification numbers (“PINs”) tied to their newly-opened FNB accounts.
6. Defendant RAMON LEIJA-VEST gave co-schemer Mitchell Neil Thompson the checkbook from defendant LEIJA-VEST’s account at PSECU, which defendant

LEIJA-VEST had previously opened at Thompson's direction.

7. Co-schemer Mitchell Neil Thompson used the ATM debit cards and PINs tied to his co-schemers' FNB accounts to deposit into their FNB accounts fraudulent checks written from his own PSECU account and the PSECU accounts of defendant RAMON LEIJA-VEST and co-schemer Charlese Lynn Carroll.

8. Co-schemer Mitchell Neil Thompson used the ATM debit cards and PINs tied to his co-schemers' FNB accounts to withdraw cash from their FNB accounts via cash withdrawals at ATMs and via point of sale ("POS") transactions and cash withdrawals at various merchants, before FNB discovered that the checks deposited into the accounts were fraudulent.

FNB ACCOUNT OF CHARLESE LYNN CARROLL

(Intended Loss of \$750; Actual Loss of \$0)

9. On or about November 1, 2017, at the FNB branch in Reading, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll opened a FNB account.

10. On or before November 2, 2017, co-schemer Charlese Lynn Carroll gave co-schemer Mitchell Neil Thompson the ATM debit card and PIN associated with co-schemer Charlese Lynn Carroll's FNB account in return for a promise of a portion of the proceeds successfully obtained by Thompson through a fraud on FNB using co-schemer Charlese Lynn Carroll's account.

11. On or about November 2, 2017, at the FNB branch located in Reading, Pennsylvania, co-schemer Charlese Lynn Carroll deposited a fraudulent check drawn in the amount of approximately \$750 into Carroll's FNB account -- check number 105, drawn on the closed PSECU account of defendant RAMON LEIJA-VEST, and made payable to co-schemer

Charlese Lynn Carroll.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3-5, 10, and 17 of Count One are incorporated here.
2. At all times material to this information, Visions Federal Credit Union (“VFCU”) was a financial institution chartered by the National Credit Union Administration, charter number 17429, whose deposits were insured by the National Credit Union Share Insurance Fund.
3. From in or about November 2017, to in or about May 2018, in the Eastern District of Pennsylvania and elsewhere, defendant

RAMON LEIJA-VEST

alone and with co-schemers known and unknown, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud VFCU and to obtain monies owned by and under the care, custody, and control of VFCU by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

4. Co-schemer Mitchell Neil Thompson recruited other co-schemers, including defendant RAMON LEIJA-VEST and co-schemer Charlese Lynn Carroll, to open accounts at VFCU in order to use the accounts to defraud VFCU by cashing fraudulent checks against the new accounts, by promising the co-schemers a share of the fraud proceeds successfully obtained from VFCU.
5. Co-schemer Charlese Lynn Carroll recruited other co-schemers (hereinafter referred to as the “Account Holders”), including Israel Martinez, charged separately, to open accounts at VFCU in order to use the accounts to defraud VFCU by cashing fraudulent

checks against the new accounts, by promising the Account Holders a share of the fraud proceeds successfully obtained from VFCU.

6. At the direction of co-schemer Charlese Lynn Carroll, co-schemer Israel Martinez recruited other co-schemers to serve as Account Holders, including Moses Marcano and Jonathan Rivera, each charged separately, and D.K., to open accounts at VFCU in order to use the accounts to defraud VFCU by cashing fraudulent checks against the new accounts, by promising the Account Holders a share of the fraud proceeds successfully obtained from VFCU.

7. Defendant RAMON LEIJA-VEST and co-schemer Christian Gonzalez gave co-schemer Mitchell Neil Thompson the checkbooks from their accounts at PSECU, which they had previously opened at Thompson's direction.

8. Co-schemer Mitchell Neil Thompson gave co-schemer Charlese Lynn Carroll the checkbooks from the closed PSECU checking accounts of defendant RAMON LEIJA-VEST and co-schemer Christian Gonzalez

9. Co-schemer Mitchell Neil Thompson and co-schemer Charlese Lynn Carroll provided the account holders with funds to open the VFCU accounts and gave the Account Holders instructions on what to say and do when they went into the VFCU branches to open the accounts.

10. Co-schemer Mitchell Neil Thompson and co-schemer Charlese Lynn Carroll provided the Account Holders with checks that were tied to the closed PSECU accounts of defendant RAMON LEIJA-VEST and co-schemers Carroll and Christian Gonzalez, and instructed the Account Holders to cash the checks at various VFCU branches.

VFCU ACCOUNT OF CHARLESE LYNN CARROLL

(Intended Loss of \$11,415; Actual Loss of \$11,415)

11. On or before November 1, 2017, at the request of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll agreed to open a VFCU account in order for the account to be used to cash fraudulent checks and to obtain the funds before VFCU discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from VFCU.

12. On or about November 1, 2017, at a VFCU branch located in Cumru Township, Berks County, Pennsylvania, while co-schemer Mitchell Neil Thompson was present, co-schemer Charlese Lynn Carroll opened a VFCU account.

13. On or about November 2, 2017, at a VFCU branch located in Cumru Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #103, made payable to Carroll in the amount of approximately \$965.

14. On or about November 3, 2017, at a VFCU branch located in Spring Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #112, made payable to Carroll in the amount of approximately \$925.

15. On or about November 3, 2017, at a VFCU branch located in Muhlenberg Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of

defendant RAMON LEIJA-VEST -- check #110, made payable to Carroll in the amount of approximately \$965.

16. On or about November 3, 2017, at a VFCU branch located in Cumru Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #111, made payable to Carroll in the amount of approximately \$950.

17. On or about November 3, 2017, at a VFCU branch located in Muhlenberg Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #108, made payable to Carroll in the amount of approximately \$950.

18. On or about November 3, 2017, at a VFCU branch located in Spring Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #113, made payable to Carroll in the amount of approximately \$950.

19. On or about November 3, 2017, at a VFCU branch located in Cumru Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #115, made payable to Carroll in the amount of approximately \$950.

20. On or about November 4, 2017, at a VFCU branch located in Muhlenberg

Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #118, made payable to Carroll in the amount of approximately \$960.

21. On or about November 4, 2017, at a VFCU branch located in Cumru Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #119, made payable to Carroll in the amount of approximately \$950.

22. On or about November 6, 2017, at a VFCU branch located in Muhlenberg Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #161, made payable to Carroll in the amount of approximately \$950.

23. On or about November 6, 2017, at a VFCU branch located in Spring Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #169, made payable to Carroll in the amount of approximately \$950.

24. On or about November 6, 2017, at a VFCU branch located in Muhlenberg Township, Berks County, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, co-schemer Charlese Lynn Carroll cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #170, made payable to Carroll in the amount of

approximately \$950.

VFCU ACCOUNT OF RAMON LEIJA-VEST

(Intended Loss of \$1,720; Actual Loss of \$0)

25. On or before January 29, 2018, at the request of co-schemer Mitchell Neil Thompson, defendant RAMON LEIJA-VEST agreed to open a VFCU account in order for the account to be used to cash fraudulent checks and to obtain the funds before VFCU discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from VFCU.

26. On or about January 29, 2018, at a VFCU branch located in Spring Township, Berks County, Pennsylvania, defendant RAMON LEIJA-VEST opened a VFCU account.

27. On or about January 29, 2018, at a VFCU branch located in Reading, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, defendant RAMON LEIJA-VEST attempted to cash a fraudulent check drawn on the PSECU account of co-schemer Charlese Lynn Carroll in the amount of approximately \$850. When the teller refused to cash the check because co-schemer Charlese Lynn Carroll's own VFCU account was already overdrawn due to Charlese Lynn Carroll's own prior cashing of fraudulent checks, defendant RAMON LEIJA-VEST left the VFCU branch with the check.

28. On or about January 29, 2017, at a VFCU branch located in Shillington, Pennsylvania, at the direction of co-schemer Mitchell Neil Thompson, defendant RAMON LEIJA-VEST attempted to cash a fraudulent check drawn on the PSECU account of co-schemer Christian Gonzalez – check #197, made payable to defendant LEIJA-VEST in the amount of approximately \$870 – but the teller refused to cash the check and instead confiscated

it because the branch had already been alerted to defendant LEIJA-VEST's earlier attempt to cash co-schemer Charlese Lynn Carroll's fraudulent check.

VFCU ACCOUNT OF MOSES MARCANO

(Intended Loss of \$1,800; Actual Loss of \$1,775)

29. On or before April 14, 2018, at the request of co-schemers Israel Martinez and Charlese Lynn Carroll, co-schemer Moses Marciano agreed to open a VFCU account in order to cash fraudulent checks and obtain the funds before VFCU discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from VFCU.

30. On or about April 14, 2018, at a VFCU branch in Exeter Township, Berks County, Pennsylvania, co-schemer Moses Marciano opened a VFCU account using the approximately \$25 provided by co-schemer Charlese Lynn Carroll.

31. On or about April 14, 2018, at a VFCU branch located in Cumru Township, Berks County, Pennsylvania, co-schemer Moses Marciano cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #152, made payable to Marciano in the amount of approximately \$900.

32. On or about April 14, 2018, at a VFCU branch located in Spring Township, Berks County, Pennsylvania, co-schemer Moses Marciano cashed a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #101, made payable to Marciano in the amount of approximately \$900.

VFCU ACCOUNT OF D.K.

(Intended Loss of \$900; Actual Loss of \$0)

33. On or before April 16, 2018, at the request of co-schemers Israel Martinez

and Charlese Lynn Carroll, co-schemer D.K. agreed to open a VFCU account in order to cash fraudulent checks and obtain the funds before VFCU discovered that the checks were fraudulent, in return for the promise of a portion of the proceeds successfully obtained from VFCU.

34. On or about April 16, 2018, at a VFCU branch in Exeter Township, Berks County, Pennsylvania, co-schemer D.K. opened a VFCU account using approximately \$25 provided by co-schemer Charlese Lynn Carroll.

35. On or about April 16, 2018, at a VFCU branch located in Cumru Township, Berks County, Pennsylvania, co-schemer D.K. attempted without success to cash a fraudulent check drawn on the PSECU account of defendant RAMON LEIJA-VEST -- check #109, made payable to D.K. in the amount of approximately \$900. When the teller refused to cash the check, co-schemer D.K. deposited the check into his VFCU account.

All in violation of Title 18, United States Code, Sections 1344 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344 set forth in this information, defendant

RAMON LEIJA-VEST

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$11,347.44 in United States currency (money judgment).

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A).

A TRUE BILL:

GRAND JURY FOREPERSON


WILLIAM M. McSWAIN
UNITED STATES ATTORNEY